

RECEIVED

NOV 27 1996

RECEIVED
COMMUNICATIONS DIVISION

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Implementation of the) CC Docket No. 96-128
Pay Telephone Reclassification)
and Compensation Provisions of the) CC Docket No. 91-35
Telecommunications Act of 1996)

DOCKET FILE COPY ORIGINAL

AMERITECH'S PLAN
TO PROVIDE
COMPARABLY EFFICIENT INTERCONNECTION
TO PROVIDERS OF
PAY TELEPHONE SERVICES

Frank Michael Panek
Michael S. Pabian

Counsel for Ameritech
Room 4H84
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
Telephone: (847) 248-6064

Dated: November 27, 1996

No. of Copies rec'd 0097
List ABCDE

TABLE OF CONTENTS

| | | |
|-----|---|----|
| I | Introduction and Summary | 1 |
| II | Compliance With CEI Parameters | 3 |
| | A. Interface Functionality | 3 |
| | B. Unbundling of Basic Services | 4 |
| | C. Resale | 7 |
| | D. Technical Characteristics | 7 |
| | E. Installation, Maintenance and Repair Nondiscrimination | 9 |
| | F. End User Access | 12 |
| | G. CEI Availability | 12 |
| | H. Minimization of Transport Costs | 13 |
| | I. Recipients of CEI | 14 |
| III | Other Safeguards | 15 |
| | A. Customer Proprietary Network Information (“CPNI”) | 15 |
| | B. Network Disclosure | 16 |
| | C. Non-Discrimination Reporting | 17 |
| | D. Allocation of Joint and Common Costs | 17 |
| IV | Conclusion | 18 |

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

| | | |
|------------------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| Implementation of the |) | CC Docket No. 96-128 |
| Pay Telephone Reclassification |) | |
| and Compensation Provisions of the |) | CC Docket No. 91-35 |
| Telecommunications Act of 1996 |) | |

AMERITECH'S PLAN
TO PROVIDE
COMPARABLY EFFICIENT INTERCONNECTION
TO PROVIDERS OF
PAY TELEPHONE SERVICES

I. Introduction and Summary

Ameritech respectfully submits this plan to provide Comparably Efficient Interconnection ("CEI") to providers of pay telephone services, as required by the Federal Communications Commission ("Commission") in the above-captioned matter. In this proceeding, conducted by the Commission at the direction of Congress as set forth in the Telecommunications Act of 1996 ("1996 Act"),¹ the Commission has ordered the unbundling of the Bell Operating Companies' ("BOCs") pay telephone services as well as the reclassification of all pay telephone

¹ 47 USC 276(b)(1)(C).

instruments as customer premises equipment (“CPE”).² In addition to the accounting safeguards adopted in the Order, the Commission concluded that its Computer III and Open Network Architecture (“ONA”) non-structural safeguards would ensure that BOCs do not discriminate or cross-subsidize in their provision of payphone service.³ To that end, the Commission has required each BOC to file a CEI plan within 90 days of the Order’s effective date⁴ describing how it intends to comply with the CEI parameters developed in the Commission’s Computer Inquiry III record,⁵ as well as with other nonstructural safeguards imposed upon the BOCs in their provision of pay telephone services. As explained in the balance of this CEI plan, Ameritech complies fully with each of the related requirements set forth in the Order and Reconsideration Order. Thus, timely approval of this CEI plan is appropriate.

² In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket Nos. 96-128 and 91-35, Report and Order, FCC 96-388, rel. September 20, 1996 (hereinafter “Order”); Order on Reconsideration, FCC 96-439, rel. November 8, 1996 (hereinafter “Reconsideration Order”).

³ Order at ¶ 199.

⁴ Id. at ¶ 202.

⁵ In the Matter of Amendment of Section 64.702 of the Commission’s Rules and Regulations (Third Computer Inquiry), CC Docket No. 85-229, Report and Order (hereinafter “Phase I Order”), 104 FCC 2d 958, 1039-43.

II. Compliance with CEI Parameters

A.. Interface Functionality

This parameter requires that standardized hardware and software interfaces be made available in a manner that supports transmission, switching, and signaling functions identical to those utilized by the BOC in providing the same services.⁶ Ameritech provides under tariff in all its states two types of lines for use by pay telephone service providers:

- An Independent Payphone Provider (“IPP”) coin line for use with “dumb” pay telephone sets.
- A Customer Owned Pay Telephone (“COPT”) service line for use with “smart” pay telephone sets.

These tariffs are included in Attachment A.

Ameritech’s payphone operations will be using initially the IPP coin line. All such access arrangements are currently available to all other providers of pay telephone services at the same tariffed rates, and on the same terms and conditions. Thus, in all cases, Ameritech's pay telephone services and the competing services of other providers will access the public switched telephone network through identical standard network interfaces. As noted in relevant tariffs, the interface for the IPP coin line -- AM-TR-NIS-000095 -- is publicly available.⁷ Furthermore, no special interfaces,

⁶ Id. at ¶ 157.

⁷ A copy is included as Attachment B.

signaling, abbreviated dialing, derived channels or other capabilities will be made available to Ameritech's pay telephone services.

B. Unbundling of Basic Services

Compliance with this CEI parameter requires that the basic services and basic service functions that underlie a BOC's pay telephone services must be unbundled from other basic service offerings and must be associated with a specific rate element.⁸ As noted above, the basic service currently used in providing Ameritech's pay telephone services -- the IPP coin line -- is available to affiliated and nonaffiliated pay telephone service providers at the same rates, and on the same terms and conditions. The basic service is unbundled from other services. Moreover, all options and functions included in this basic service are available to unaffiliated providers on the same basis as they are available to Ameritech's affiliated pay telephone operations.

At the present time, the complete unbundling of all individual coin telephone line functionality is not technically feasible. The current IPP coin line service includes the following functionalities:

- Coin Rating - This function provides rates from a table entry built into the Traffic Operator Position Switch ("TOPS") with which the coin line interfaces in the central office.
- Coin Supervision - This function provides the capability of recognizing and monitoring coins deposited into the pay telephone.

⁸ Id. at ¶ 158.

- **Coin Control** - This function provides a +130v signal when the called party answers or a -130v signal when the called party does not answer to allow for the collection or return of deposited coins.
- **Call Screening** - This function assists in reducing toll fraud by restricting operator assisted calls originated from the station from being billed back to the coin line.

These coin line features are integrated in the central office hardware and software in such a way that individual features cannot now be offered separately. None of the current switch manufacturers provide for this unbundled capability today. Unbundling of these coin line features would require modification of the switch by manufacturers, as well as development of new software. Based on past experience, it would take about two years for switch manufacturers to develop new features. Generally, the practice of switch manufacturers is to develop new features that have the widest demand from all purchasers of their switches. While it is possible for a single company to contract for the development of new switch features, it would be prohibitively expensive.

The following IPP coin line functions, however, will be unbundled and offered separately, as shown in illustrative tariffs included in Attachment C.

- **Outgoing Service Only** - This feature blocks incoming calls. Parties calling the pay telephone number will hear an announcement that the telephone is not in service to receive calls.
- **Restricted Coin Access** - This feature permits coin sent-paid calls to be blocked during certain hours of the day. Callers using coins during restricted hours will have their coins

returned and hear an announcement advising that the phone is not equipped for coin calls during certain hours.

Each one of these features will enable a pay telephone service provider using Ameritech's IPP coin telephone line to better tailor an offering to suit the needs of a particular premises owner. In certain cases, use of one or more of these features can assist the premises owner in managing his or her business location by reducing loitering and traffic associated with payphone use and by restricting the ability of third parties to use the payphone to conduct illegal activity. Ameritech will file tariffs for these features in each of its states by January 15, 1997.⁹

In addition, as required by the Commission, Ameritech will make available to unaffiliated pay telephone service providers additional unbundled services as submitted through the existing 120-day ONA service request process, where such unbundling is technically feasible.¹⁰ Also, in any jurisdiction where Ameritech utilizes any new basic services or basic service functions in the provision of its pay telephone services, those services or functions will also be made available to other telecommunications service providers in a nondiscriminatory fashion.

⁹ Call flow diagrams demonstrating the operation of these features are also included in Attachment C. Neither feature involves a change to the technical service interface associated with an IPP coin line. Nonetheless, Ameritech will be including these two features in its "in process" network disclosure filing that will be made pursuant to the Commission's Second Report and Order in CC Docket No. 96-98 (released August 8, 1996) at ¶ 234.

¹⁰ Order at ¶¶ 148, 200.

C. Resale

Under this parameter, a BOC's affiliated service provider must take all basic services used in the provision of pay telephone services at the same unbundled rates, and on the same terms and conditions, as they are available to nonaffiliated pay telephone service providers.¹¹ Ameritech's pay telephone service operations will obtain all needed underlying basic services at tariffed rates in each of the jurisdictions currently served by Ameritech, and on the same terms and conditions upon which they are available to nonaffiliated providers. For the unbundled features noted above, the tariffs will be filed in the appropriate regulatory jurisdictions by January 15, 1997.

In addition, the state tariffs currently in effect for existing basic services and basic service functions were already approved by the state commissions. As required by each commission, the cost support for each IPP coin line tariff filing -- the service utilized by Ameritech's pay telephone operations -- was based on long run service incremental cost ("LRSIC") methodology, representing the forward-looking additional cost of providing the service. Since the rate for the service covers appropriate cost, the service is not subsidized by Ameritech's exchange service or exchange access operations.

D. Technical Characteristics

¹¹ Phase I Order at ¶ 159.

Compliance with this CEI parameter requires that a BOC provide basic services with technical characteristics that are equal to those of the basic services which it uses for its own pay telephone services.¹² In all cases, interconnection to Ameritech's pay telephone services will be accomplished through an existing standard network interface.¹³ This interface will support identical transmission, switching and signaling functions for the pay telephone services offered by Ameritech and other pay telephone service providers. Thus, the technical characteristics of the underlying interface used by Ameritech in providing these services will be identical in their transmission parameters, quality, reliability and other relevant characteristics to those available to nonaffiliated pay telephone service providers who use them in providing the same or similar services. As it currently does with respect to its provision of enhanced services, Ameritech will continue to file an annual affidavit attesting that appropriate procedures have been followed by Ameritech personnel and that no discrimination based on the identity of the customer has in fact occurred.

¹² Id. at ¶ 160.

¹³ See, section II(A), supra.

E. Installation, Maintenance and Repair Nondiscrimination

As required by this CEI parameter, a BOC must insure that time periods for the installation, maintenance and repair of basic services which are used in the provision of its own pay telephone services are the same as those experienced by nonaffiliated providers of competing services.¹⁴

First, it should be noted that all unaffiliated pay telephone service providers that utilize Ameritech basic services are provided with a handbook that details Ameritech's service order process and installation and repair procedures. The handbook is updated as needed. In addition, Ameritech maintains a staff dedicated to serving the needs of pay telephone service providers that utilize Ameritech basic services.

Further, Ameritech's installation, maintenance and repair procedures will be reconfigured so as to preclude discrimination among customers of Ameritech's IPP coin or COPT service lines. At the beginning of 1997, the distribution of work functions between employees of Ameritech payphone operations and Ameritech's Network employees will be shifting. Work associated with basic services relating to IPP coin lines utilized by Ameritech payphone operations currently performed by payphone technicians will transfer to Network technicians. In those areas in which Network

¹⁴ Phase I Order at ¶ 161.

technicians currently perform some telephone set installation or repair, those functions will transition to payphone technicians. When these changes are implemented, installation and maintenance of basic services utilized by Ameritech payphone operations will be performed the same as they are for basic services purchased by nonaffiliated pay telephone service providers.

Installation orders for basic services utilized by both Ameritech pay telephone operations and unaffiliated pay telephone service providers will both be entered into the Ameritech Customer Information System ("ACIS") with standard or customer negotiated due dates. These ACIS orders are scheduled and dispatched to Ameritech Network technicians through the Work Force Administration ("WFA") system for completion. WFA assigns orders based upon due date and geography without regard to the identity of the customer of the service.

Repair requests relating to basic coin line service utilized by Ameritech pay telephone operations will be sent to the Network Loop Maintenance Operating System ("LMOS") via electronic bonding. This electronic bonding will be available to nonaffiliated pay telephone service providers at the same time as it is available to Ameritech's payphone operations. The Network LMOS system will receive repair cases on both Ameritech payphone lines and nonaffiliated pay telephone service provider lines. The system-determined

commitment date and time will be set on all lines on a nondiscriminatory basis. These cases will be dispatched to Network personnel on a nondiscriminatory basis. Network personnel will work only on the network side of the telephone line (only up to and including the NI) and will work repair cases based upon commitment time and geography without regard to the identity of the customer of the service.

All Ameritech Network employees involved in the installation, maintenance or repair of IPP coin and COPT service lines will be instructed as to the Ameritech policy that no discrimination should be made based on the identity of the customer of the service.

In addition, the practices followed by Ameritech's employees are sufficiently automated that any systematic discrimination in the installation, maintenance or repair of such services would be both extremely difficult and highly unlikely. Since, to be effective, any attempt at discrimination would have to be so overt as to be noticeable by the end-user customers of any competing provider, such an attempt would most likely result in the filing of a service-quality complaint by that provider. As an additional measure, as noted in section III(c) below, Ameritech will file quarterly reports demonstrating that no such discrimination has, in fact, occurred.

F. End User Access

In full compliance with this CEI parameter,¹⁵ basic services provided to Ameritech's pay telephone operations will in all cases present the end user with the same operational characteristics as those that are available to end users who use other pay telephone services that use Ameritech tariffed basic services. No unique abbreviated dialing or signaling arrangements, and no special derived channel access arrangements, are or will be associated with these services.

G. CEI Availability

This parameter requires that a BOC's CEI offering must be fully operational and available to competing pay telephone service providers on the date that the BOC offers its corresponding pay telephone service to the public.¹⁶ Ameritech currently provides pay telephone services using basic services and basic functionalities that are also available to other providers of pay telephone services on the same terms and conditions. Moreover, as of January 15, 1997 (and pending effectiveness of the Subscriber Line Charge changes that will be filed shortly) Ameritech's affiliated pay telephone operations will obtain all such basic services and basic functionalities at the same rates as those paid by unaffiliated pay telephone service providers for

¹⁵ Id. at ¶ 162.

¹⁶ Id. at ¶ 163.

the same services and functionalities. If and when other unbundled basic functionalities which may be requested by unaffiliated pay telephone service providers are implemented,¹⁷ Ameritech will provide other providers with a reasonable testing period¹⁸ before using these new basic offerings in the provision of its own pay telephone services.

H. Minimization of Transport Costs

Recognizing that competing service providers may incur certain equipment and transmission costs that BOCs could avoid by virtue of collocating or integrating enhanced services facilities with basic network facilities, the Commission has required by this CEI parameter that BOCs provide competing carriers with interconnection arrangements (e.g., loop or trunk multiplexing) that minimize such costs.¹⁹ As explained in section II(B) above, interconnection to all facilities used by Ameritech to provide the basic services which underlie its pay telephone services is, and will continue to be,

¹⁷ Other than two features noted in section II(B), supra.

¹⁸ Phase I Order at ¶ 164. In the case of enhanced services, the Commission has determined that 90 days is a reasonable testing period. In the Matter of Bell Operating Companies' Joint Petition for Waiver of Computer II Rules, Ameritech Plan to Provide Comparably Efficient Interconnection to Competing Providers of Message Delivery Service, Order, (rel. 1/26/96). Although the Commission has not explicitly stated that these requirements would apply to BOC provision of pay telephone services, Ameritech believes that it is reasonable to apply them there as well. Thus, in compliance with the Commission's requirements, notice of the availability for testing of all new offerings will be provided either by tariff approval or via an industry-specific notification of all competing pay telephone service providers. In the Matter of Bell Operating Companies' Joint Petition for Waiver of Computer II Rules, Minor Modification of Ameritech Plan to Provide Comparably Efficient Interconnection to Competing Providers of Voice Mail Messaging Service, Order, (rel. 11/14/96).

¹⁹ Phase I Order at ¶ 164.

provided under tariffed arrangements and are thus available at the same rates, and on the same terms and conditions, to both affiliated and nonaffiliated providers of pay telephone services. As other interconnection configurations and serving arrangements are requested and/or become technically feasible, Ameritech will work in good faith with other service providers to develop and implement techniques which minimize transport costs.

I. Recipients of CEI

As required by this CEI parameter,²⁰ the availability of the basic services and basic service functions which underlie Ameritech's pay telephone services is not limited to any particular class of customer. As noted in the tariffs provided in Attachment A, all such services and functions are available to all users for any lawful purpose, although state law or regulations and Commission regulations may place certain restrictions on those Ameritech customers that use these basic services to provide pay telephone services.

²⁰ Id.

III. Other Safeguards

A.. Customer Proprietary Network Information ("CPNI")

The Commission directed BOCs' CEI plans to describe compliance with CPNI requirements.²¹ In that regard, Ameritech pay telephone personnel will be "mechanically blocked" from access to CPNI associated with other customer lines contained in databases maintained by Ameritech regulated operations. Access will be limited via a password driven security table. Personnel associated with Ameritech pay telephone operations will be permitted access to data concerning the use of the lines to which it subscribes on the same terms and conditions that such information is available to other pay telephone service providers concerning the use of the lines to which they subscribe.

In addition, as the Commission has noted, carriers' specific obligations in connection with the 1996 Act's CPNI requirements are currently under consideration in a separate proceeding.²² Ameritech will continue to comply with these obligations as they evolve and become more specific.

²¹ Order at ¶205.

²² Implementation of the Telecommunications Act of 1996. Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, Notice of Proposed Rulemaking, CC Docket No. 96-115 (rel. May 17, 1996).

B. Network Disclosure

Since interconnection between Ameritech's pay telephone services and the underlying basic services is accomplished in all cases through existing, published standard network interfaces, neither changes to existing network interface specifications nor publication of any new interfaces is required at this time. However, as network changes are implemented by Ameritech for use in the provision of its pay telephone services, to the extent that network disclosure obligations are triggered under the Commission's Computer Inquiry III and ONA regimes,²³ the Commission's network disclosure requirements related to enhanced services and CPE will be fully adhered to.²⁴ In addition, Ameritech will continue to comply with all related network disclosure requirements imposed upon incumbent LECs in the Commission's proceeding to implement the interconnection requirements of the 1996 Act.²⁵

²³ As noted by the Commission, the information subject to disclosure under this requirement includes all network changes and new basic services that affect the interconnectivity of enhanced services with the network. Reconsideration Order at note 592.

²⁴ To permit timely and effective implementation of the pay telephone unbundling requirements of the 1996 Act, the Commission granted a partial waiver of the enhanced services and CPE network disclosure requirements to provide relief from their strict time limitations. Order at ¶ 146.

²⁵ As noted above, the two unbundled features associated with Ameritech's IPP coin line will be included in Ameritech's upcoming "in process" network disclosure filing.

C. Nondiscrimination Reporting

Ameritech will track and report on a quarterly basis the installation and maintenance intervals for basic pay telephone services provided to its affiliated pay telephone service operations, and compare these intervals to those experienced by all of Ameritech's nonaffiliated customers. These reports will demonstrate that no discrimination in these intervals has in fact occurred. Since no additional pay telephone-related reporting requirements beyond the existing Computer III- and ONA-related requirements have been imposed upon the BOCs, Ameritech will continue to submit reports in those contexts and formats.²⁶

D. Allocation of Joint and Common Costs

All joint and common costs will to be allocated pursuant to the Commission's rules, as reported in Ameritech's Part 64 Cost Allocation Manual ("CAM").²⁷ In addition, as the Commission has noted, nonstructural accounting safeguards applicable to the BOCs' provision of pay telephone

²⁶ A copy of a recent Ameritech ONA parity report is included as Attachment D.

²⁷ Ameritech's CAM was amended pursuant to the Order on October 22, 1996, to reflect the Part 64 cost accounting requirements imposed by the Order upon BOC pay telephone operations. A copy of the relevant pages from that Amendment are provided as Attachment E hereto. The effective date of the CAM is dependent on Ameritech's fulfillment of all conditions of the Reconsideration Order. See the letter from Robin Gleason to Kenneth Ackerman included as Attachment F.

services are already being considered in a separate proceeding.²⁸ Ameritech will fully comply with the requirements set forth by the Commission in that matter, as they relate to the provision of pay telephone services.

IV. Conclusion

Since this filing fully complies in every regard with the Commission's stated requirements for approval of a pay telephone CEI plan, timely approval of this plan is hereby requested.

Respectfully submitted,

A handwritten signature in cursive script, reading "Frank M. Panek".

Frank Michael Panek
Michael S. Pabian

Counsel for Ameritech
Room 4H84
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
Telephone: (847) 248-6064

Dated: November 27, 1996

[c:fmp0004.doc]

²⁸ Implementation of the Telecommunications Act of 1996, Accounting Safeguards under the Telecommunications Act of 1996, Notice of Proposed Rulemaking, 11 FCC 2d 9054 (1996).

ATTACHMENT A

INDEX

STATE TARIFFS - BASIC COIN LINE IPP COIN LINE

Indiana
Michigan
Ohio
Wisconsin
Illinois

PART 13 - Public Telephone Services
SECTION 2 - Independent Payphone
Provider Services

1st Revised Sheet No. 1
Cancels
Original Sheet No. 1

1. INDEPENDENT PAYPHONE PROVIDER SERVICE (Formerly known as CUSTOMER-OWNED PAY TELEPHONE SERVICE, COPTS)

(T)

A. DESCRIPTION

Independent Payphone Provider (IPP) Service; subscribers' telephone service that allows the subscriber to resell telephone service to users on a per message basis utilizing a registered pay set.

Service Charges - IPP; Non-Recurring charges applicable for Service Connections, Inside Moves, Equipment and Wiring Changes, and Records Work Only.

B. DEFINITIONS

1. Service Charges - IPP

- **Equipment and Wiring Changes;** A rearrangement of equipment or wiring which does not involve a change in location of equipment.
- **Inside Moves;** Transfer of existing service or equipment from one location to another on the same premises and in the same building.
- **Maintenance of Service Charges;** A non-recurring charge that applies for a repair visit to a customer's premises in connection with a service difficulty.

(T)

PART 13 - Public Telephone Services
SECTION 2 - Independent Payphone
Provider Services

1. INDEPENDENT PAYPHONE PROVIDER SERVICE (Formerly known as CUSTOMER-OWNED PAY TELEPHONE SERVICE, COPTS) (cont'd)

(T)

B. DEFINITIONS (cont'd)

- **Service Request Charges - Initial;** Request for connecting new or additional central office lines.
- **Service Request Charges - Subsequent;** Request for moving or changing existing service and equipment or adding new or additional service and equipment other than central office lines.

C. TERMS AND CONDITIONS

Rates and regulations in this Tariff are in addition to those set forth in other Parts of this Tariff as they relate to Business Services.

1. Independent Payphone Provider (IPP) Service

a. The following minimum criteria requires that all IPP sets:

- Be registered with the F.C.C. in compliance with F.C.C. Docket 84-270;
- Provide dial tone first and be able to reach an operator and 911 Service, where available, without the use of a coin or credit card;
- Comply with applicable federal, state, and local laws and regulations concerning the use of pay stations by disabled persons;
- Provide accessibility to all Interexchange Carriers where equal access is provided;
- Not limit the duration of a call;
- Be provided with one telephone directory annually;

(T)

PART 13 - Public Telephone Services
SECTION 2 - Independent Payphone
Provider Services

2nd Revised Sheet No. 3
Cancels
1st Revised Sheet No. 3

1. INDEPENDENT PAYPHONE PROVIDER SERVICE (Formerly known as CUSTOMER-OWNED PAY TELEPHONE SERVICE, COPTS) (cont'd)

(T)

C. TERMS AND CONDITIONS (cont'd)

1. Independent Payphone Provider (IPP) Service (cont'd)

- a. The following minimum criteria requires that all IPP sets:
(cont'd)
 - Present an informational message, which may be audio or visual, in, on, or adjacent to the set which explains its general operation. The information listed should also include: the IPP's name and address and clearly state the policy and instructions for receiving a refund and/or reporting service problems;
 - Be able to provide credit card, collect, and third-party billed long distance calls without the use of a coin.
- b. In the event that an IPP is believed to have violated any of the rules and regulations for IPP Service, a verified complaint may be filed with the Commission and IPP Service may be disconnected if the deficiency is not corrected within ten (10) days from the date of written notification to the IPP, or as ordered by the Commission.
- c. Prior to the establishment of IPP Service, an IPP Access Line Service Agreement must be executed between the Telephone Company and the IPP.
- d. The IPP may charge up to, but not exceed, the highest tariffed intrastate rates and surcharge for the long distance carrier selected.
- e. All IPP sets must be equipped with suitable audible signals and arranged to receive incoming calls.
- f. All stations must be equipped with tone-type address signaling.

(T)